

PILLSBURY WINTHROP SHAW PITTMAN LLP

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*Counsel for Wilmington Trust, National Association,
as the HoldCo Revolver Loan Administrative Agent*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**WILMINGTON TRUST, NATIONAL
ASSOCIATION'S LIMITED
OBJECTION AND RESERVATION OF
RIGHTS TO DEBTORS' AND
SHAREHOLDER PROPONENTS'
JOINT CHAPTER 11 PLAN OF
REORGANIZATION**

Hearing Date and Time

Date: May 27, 2020
Time: 10:00 a.m.
Place: U.S. Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Wilmington Trust, National Association (“**Wilmington Trust**”), in its capacity as
2 successor administrative agent under that certain Second Amended and Restated Credit
3 Agreement among PG&E Corporation as borrower and the agents and lenders thereunder, dated
4 as of April 27, 2015 respectfully submits this limited objection and reservation of rights to the
5 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization* [Doc. No.
6 6320] (the “**Plan**”).

7 On March 30, 2020, Wilmington Trust filed a *Motion for an Order Allowing Proofs of*
8 *Claim Nos. 31005 and 55147 and Requiring Plan Treatment Consistent Therewith, and*
9 *Memorandum of Points and Authorities in Support* [Doc. No. 6529] (“**Motion**”). After
10 Wilmington Trust and the Plan Proponents consensually resolved the issues raised in the Motion,
11 Wilmington Trust withdrew its Motion based on the Plan Proponents’ representation that the
12 next iteration of the Plan would reflect the parties’ agreement. As of the date of this filing, the
13 Plan Proponents have not filed an amended version of the Plan. While we expect the Plan
14 Proponents to honor their agreement, since today is the objection deadline, Wilmington Trust is
15 filing this limited objection to the Plan and to reserve its rights.

16 Dated: May 15, 2020

PILLSBURY WINTHROP SHAW PITTMAN LLP

17 By: /s/ Leo Crowley
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